



Training \* Connecting \* Developing Illinois' Workforce

# Workforce Innovation and Opportunity Act

## Youth Eligibility

As of August 12<sup>th</sup>, 2020

# Federal Youth Guidance

- Workforce Innovation and Opportunity Act of 2014
- Training and Employment Guidance Letter 21-16 - Third WIOA Title I Youth Formula Guidance - dated March 2<sup>nd</sup>, 2017

# State Youth Guidance

- WIOA E-Policy Chapter 5 - General Eligibility
- WIOA E-Policy Chapter 5.1.1 - 1.1.4 - Selective Service
- WIOA E-Policy Chapter 5.4 - General Youth Eligibility
- WIOA E-Policy Chapter 5.4.1 - Out-of-School Youth
- WIOA E-Policy Chapter 5.4.2 - In-School Youth
- OET Notice NO. 19-NOT-03 - Basic Skills Deficient
- WIOA E-Policy Chapter 5.5 - Low-Income Individuals

Below is the URL to the Apprenticeship Resources Page - See Eligibility Documents  
<https://www.illinoisworknet.com/partners/Pages/ApprenticeshipResources.aspx>

# Apprenticeship Expansion Grantees

- Prior to reviewing this power point on Youth Eligibility, it is important that you view and understand the details that were covered in the previous presentations on:
  - WIOA General Eligibility
  - WIOA Low Income

# WIOA Youth Program

- Workforce Innovation and Opportunity Act of 2014
  - In-School Youth is a separate category from Out-of-School Youth and the eligibility between these two are significantly different.

# WIOA In-School Youth

- WIOA E-Policy Chapter 5.4.2 - In-School Youth:
  - In-School Youth - Youth not younger than 14 or older than age 21
    - Attending school (as defined by state law)

# Guidance from TEGL 21-16

- For purposes of WIOA, providers of adult education under Title II of WIOA, YouthBuild programs, the Job Corps program, high school equivalency programs, and dropout re-engagement programs are not considered to be schools for the purposes of determining school status, with one exception:
  - Youth attending high school equivalency (HSE) programs, including those considered to be dropout re-engagement programs, funded by the public K-12 school system that are classified by the school system as still enrolled in school are considered ISY.

# Determining School Status

- Within the Apprenticeship Expansion Application on Goals & Current Situation screen, under “Education” is where the question to determine if an individual is an In-School Youth (ISY) or an Out-of-school Youth (OSY).
- The school status should be recorded based on what the client is doing at the time of application, not what the client is going to enter.

## EDUCATION

- I am currently in school.
- I have a hard time with reading, writing, and/or math.
- I have trouble with reading or speaking English.
- I dropped out of high school.
- I have not attended high school in the last quarter.

# Within Apprenticeship Application

- If “I am currently in school.” is checked, then three other questions come up and the appropriate choice should be marked for the client.
- As a reminder, the maximum age for an In-School Youth client is age 21, if the client is over the age of 21, and is in school there are no options for Youth eligibility criteria.

## EDUCATION

- I am currently in school.
- I am attending high school, junior high, middle, or elementary school.
- I am attending an alternative high school.
- I am attending college, technical, or vocational school.

# Determining School Status

- When the selection of “I am currently in school.” is checked, then three other selection choices appear, when any of those are populated, if the client is under the age of 22, internal logic will consider the individual an In-School Youth for eligibility criteria.
- For this example client, he is 21 years old, a H.S. graduate, that is currently in college.

## EDUCATION

- I am currently in school.
  - I am attending high school, junior high, middle, or elementary school.
  - I am attending an alternative high school.
  - I am attending college, technical, or vocational school.

# In-School Youth

- WIOA E-Policy Chapter 5.4.2 - In-School Youth:
  - 95% of the In-School Youth must meet low income criteria (see WIOA E-Policy Chapter 5.5 - Low-Income Individuals)
- As mentioned earlier, it is essential that you have viewed and understand the **previous power point on WIOA Low Income** so you understand the eight different ways an In-School Youth client could meet WIOA Low Income criteria.
- Lastly, all In-School Youth clients must have one or more of the following barriers shown on the next slide.

# WIOA In-School Youth Barriers

1. Basic Skills Deficient
2. An English Language Learner
3. An offender
4. Homeless
5. Runaway
6. Foster Child or aged out of foster care
7. Pregnant or Parenting
8. An individual with a disability
9. An individual requiring additional assistance to enter or complete an educational program or to secure or hold employment.

# Basic Skills Deficient

- Basic Skills Deficient - respect to an individual—  
(A) who is a youth, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test; or (B) who is a youth or adult, that the individual is unable to compute or solve problems, or read, write, or speak English, at a level necessary to function on the job, in the individual's family, or in society.

# Basic Skills Deficient (BSD)

- If an individual scores at or below 8<sup>th</sup> Grade Level on either their Math or Reading Assessment test they would be determined BSD.
- In WIOA Notice NO 19-NOT-01, Change 1 that was released by OET Policy in July 2020, it includes an alternative way an individual can be determined BSD using the Basic Skills Screening Tool (more on this later).
- Lastly, if an individual is assessed as an English Language Learner (ELL), they are also determined to meet BSD criteria.

# Basic Skills Screening Tool

- If an individual replies “No” to any of the following questions on the screening tool, they can be determined BSD:

- 1) Do you have a high school diploma, General Education Development (GED) certificate or High School Equivalency Diploma (HSED)?  Yes  No  Currently in high school (does not include GED or HSED programs)
- 2) Can you follow basic written instructions and diagrams with no help or just a little help?  Yes  No
- 3) Can you fill out basic medical forms and job applications?  Yes  No
- 4) Can you add, subtract, multiply and divide with whole numbers up to 3 digits?  Yes  No
- 5) Can you do basic tasks on a computer?  Yes  No
- 6) Do you speak and read English well enough to get and keep a job?  Yes  No

# English Language Learner

- English Language Learner - the term “English language learner” when used with respect to an eligible individual, means an eligible individual who has limited ability in reading, writing, speaking, or comprehending the English language, and (A) whose native language is a language other than English; or (B) who lives in a family or community environment where a language other than English is the dominant language.

# Youth Barriers

- The various Youth Barriers are indicated at different places throughout the Apprenticeship application.
- Many Youth barriers, including those associated with the barriers of “Basic Skills Deficient” and “English Language Learner” are on the “Goals & Current Situations” screen of the application.

# Youth Barriers

- Within the Apprenticeship Expansion Application on Goals & Current Situation screen there are questions under the Education section of “I have a hard time with reading, writing, and/or math.” and “I have trouble with reading or speaking English.” If either of those are checked as part of the application, the client will be identified with the barrier of Basic Skills Deficient or English Language Learner.

## EDUCATION

- I am currently in school.
  - I am attending high school, junior high, middle, or elementary school.
  - I am attending an alternative high school.
  - I am attending college, technical, or vocational school.
- I have a hard time with reading, writing, and/or math.
- I have trouble with reading or speaking English.

# English Language Learner

- For the question “I have trouble with reading or speaking English.” - This is the barrier of English Language Learner (ELL).
- Shown directly below are the acceptable documentation choices for the barrier of ELL.

Select Verification Type

Case notes from Career Planner

Results from authorized assessment test

WIOA application (signed and dated)

Unable to Verify

Basic Skills Screening Tool

I have trouble with reading or speaking English.\*

No authorized assessment results are available within the past 6 months.

[Add Assessment Results](#)

# Basic Skills Deficient

- For the question “I have a hard time with reading, writing, and/or math.” This is tied to the definition of the Basic Skills Deficient and below are the current acceptable documentation choices available.

Select Verification Type

Results from authorized assessment test

School Records verifying applicant unable to take assessment test

Unable to Verify

Basic Skills Screening Tool

I have a hard time with reading, writing, and/or math.\*

No authorized assessment results are available within the past 6 months.

[Add Assessment Results](#)

# Youth “Offender” Barrier

- Offender - An adult or youth (A) who is or has been subject to any stage of the criminal justice process, for whom services under this Act may be beneficial; or (B) who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

# Youth “Offender” Barrier

- As previously mentioned, many of the questions related to Youth barriers are on the Goals & Current Situation screen in the Apprenticeship application.
- Under “Legal”, as shown below are two questions, if either question is checked, it would be indicated as the barrier of “Offender” for an In-School Youth client.

## LEGAL

- I have criminal charges pending.
- I have had instances/legal problems.

# Documentation for Offender

- For the questions related to the Legal section, that are tied to the Youth barrier of “Offender”, below are the current acceptable documentation choices available.

Select Verification Type	
Applicant statement/self attestation, in limited cases	
Court Documents	
Halfway house resident	
<b>Letter from probation officer</b>	<input checked="" type="checkbox"/> I have/had instances or legal problems.*
Letter of parole	
Police records	
Unable to Verify	

# Youth “Homeless” Barrier

1. Individual who lacks a fixed, regular or adequate nighttime residence; and  
Violence Against Women Act of 1994
2. Adult or youth with a primary nighttime residence that is a public or privately operated shelter for temporary accommodation.  
McKinney-Vento Homeless Assistance Act

# Youth Barrier of Homeless

- On the Goals & Current Situation screen, under the “Housing” portion, is the question “I need a permanent place to live.”
- If that question is marked, it will meet the criteria for Youth barrier of “Homeless”; additionally, homeless is also an automatic WIOA Income criteria.

## HOUSING

  I need a permanent place to live.

# Documentation for Homeless

- In this example; “I need a permanent place to live” is populated with a check, which correlates under WIOA Low Income eligibility criteria for homeless.
- Directly below are the documentation choices for any individual who is identified in the application to the criteria of “I need a permanent place to live.”:

Select Verification Type

Signed applicant statement

Written statement from an individual providing temporary assistance

Written statement from shelter

Written statement from Social Service agency-homeless shelter/runaway services

Unable to Verify

I need a permanent place to live. (Homeless)\*

# Foster Child

- A minor on behalf of whom State or local government payments are made to a foster parent or other guardian.
- On the Goals & Current Situation screen, under the “Housing” portion, is the question “I am in foster care.”
- If that question is marked, it will meet the criteria for Youth barrier of “Foster Child”; additionally, Foster Child status is also an automatic WIOA Income criteria.

## HOUSING

- I need a permanent place to live.
- I am in foster care.

# Documentation for Foster Child

- In this example; “I am in foster care.” is populated with a check, which correlates as a Youth barrier and is an automatic WIOA Low Income criteria.
- Directly below are the documentation choices for any individual who is identified in the application to the criteria of “I am in foster care.”:

Select Verification Type	<input checked="" type="checkbox"/> I am in foster care.*
Court contract	
Court documentation	
Medical Card showing Foster Child	
Verification of payments made on behalf of child	
Written statement from State/Local agency	
Unable to Verify	<input type="checkbox"/> I have aged out of f

# Aged out of Foster Care

- On the Goals & Current Situation screen, under the “Housing” portion, is the question “I have aged out of foster care.”
- If that question is marked, it will meet the criteria for Youth barrier of “Aged out of Foster Care.”
  - Note, “Aged out of Foster Care” is not an automatic low income qualification factor under WIOA.

## HOUSING

- I need a permanent place to live.
- I am in foster care.
- I have aged out of foster care.

# Documentation for Aged Out of Foster Care

- In this example; “I have aged out of foster care.” is populated with a check, which correlates as a Youth barrier to support eligibility.
- Directly below are the documentation choices for any individual who is identified in the application to the criteria of aged out of foster care:

Select Verification Type	
Court contract	
<b>Court documentation</b>	<input checked="" type="checkbox"/> I have aged out of foster care.*
Medical Card showing Foster Child	
Verification of payments made on behalf of child	
Written statement from State/Local agency	

# Runaway

- Runaway is a barrier under WIOA Youth eligibility, it is only relevant for a Youth under the age of 18.
- On the Goals & Current Situation screen, under the “Housing” portion, is the question “I am a runaway.”
- If that question is marked, it will meet the criteria for Youth barrier of “Runaway”.

## HOUSING

- I need a permanent place to live.
  - I am in foster care.
  - I have aged out of foster care.
  - I am a runaway.
- 

# Documentation for Runaway

- In this example; “I am a runaway.” is populated with a check, which correlates as a Youth barrier to support eligibility.
- Directly below are the documentation choices for any individual who is identified in the application with the criteria of “runaway”:

Select Verification Type	
Signed applicant statement	
Written statement from an individual providing temporary assistance	
<b>Written statement from shelter</b>	I am a runaway.*
Written statement from Social Service agency-homeless shelter/runaway services	
Unable to Verify	

# Pregnant or Parenting Barrier

- If a Youth client is pregnant (note, only female clients can use pregnant barrier) or parenting, it is a barrier to support Youth Eligibility.
- On the Goals & Current Situation screen, under the “Family” are the questions below, if either or both questions are checked, it would correlate to the barrier of Pregnant or Parenting Youth.

## FAMILY

- I am pregnant.
- I have children and would need help getting childcare.

# Documentation for Barrier

- On the Goals & Current Situation screen, under “Family” are questions of, ”I am pregnant.” and “I have children and would need help getting childcare.”, if either or both questions are checked in the application, it would correlate to the barrier of Pregnant or Parenting Youth.
- Below are the documentation choices for these barriers.

Select Verification Type	
Case Notes regarding observable condition	
Child's Birth certificate	<input checked="" type="checkbox"/> I am pregnant.*
Hospital record of birth	
Medical Card	
Physician's Statement	
Public Assistance/Social Service records	
Referral from official agencies	<input checked="" type="checkbox"/> I have children and would need help getting childcare.*
School program for pregnant teens	
School Records	
Signed applicant statement	

# An Individual with a Disability

- On the “Goals & Current Situation” screen in the application it asks about “Physical/Health”, if either “I have a disability that makes it hard for me to do certain things.” or “I am legally blind.” is populated with a check, the application records barrier of a disability.

## PHYSICAL/HEALTH

- 
- I have a disability that makes it hard for me to do certain things.
  - I am legally blind.
  - I need help overcoming a substance abuse problem.

# If Disability Claimed

- If a disability is claimed on the application (as addressed in the previous slide), when eligibility is completed you would be required to provide details about the disability, including indicating the “Category of Disability”.

 

I have a disability that makes it hard for me to do certain things. \*



## Category of Disability\*

- Physical/Chronic Health Condition
- Physical/Mobility Impairment
- Mental or Psychiatric Disability
- Vision related Disability
- Hearing related Disability
- Learning Disability
- Cognitive/Intellectual Disability

# Documentation for Disability

- If a Youth client indicated a disability in the application, it is a barrier to support Youth eligibility.
- Below are the choices for the documentation to support the barrier of a disability.

## Select Verification Type

Case Notes regarding observable condition by Case Manager  
 Individual Education Plan from school  
 Letter from drug or alcohol rehabilitation agency  
 Medical Records  
 Physician's Statement  
 Psychiatrist or Psychologist Diagnosis  
 Rehabilitation evaluation records  
 School Records  
 Sheltered workshop certification  
 Social Security Administration Disa. records  
 Social Service records/Referral  
 Veterans Administration Disability Determination letter/Records  
 Vocational Rehabilitation Letter  
 Worker's Compensation Record  
 Unable to Verify

I have a disability that makes it hard for me to do certain things. \*

## Category of Disability\*

- Physical/Chronic Health Condition
- Physical/Mobility Impairment
- Mental or Psychiatric Disability
- Vision related Disability
- Hearing related Disability
- Learning Disability
- Cognitive/Intellectual Disability

# Youth Barrier Must Understand

- Under Youth eligibility, there is a barrier for, “An individual **requiring additional assistance** to enter or complete an educational program or to secure or hold employment.”
- It is important to understand the criteria to support this barrier is determined by each Local Workforce Innovation Area (LWIA) in their own Local Policy.
  - So if this barrier is indicated in an application, staff must explain in the case note, how the client meets the particular criteria that is laid out within the LWIA Policy on this barrier.

# Youth Requiring Assistance

- On the “Goals & Current Situation” screen in the application it asks under Education, “I need help to enter or complete an educational program or to secure or hold employment.”
- If this is populated with a check, the youth barrier of “An individual requiring additional assistance to enter or complete an educational program or to secure or hold employment.” is indicated.

## EDUCATION

- I am currently in school.
- I have a hard time with reading, writing, and/or math.
- I have trouble with reading or speaking English.
- I dropped out of high school.
- I have not attended high school in the last quarter.
- I need help to enter or complete an educational program or to secure or hold employment.

# Youth Needing Assistance Documentation

- If the “Youth needing assistance” barrier is claimed, when eligibility is completed you would be required to provide details in a case note on how the client meets the criteria outlined with the LWIA local policy on this barrier.
- It is really important to understand these details for this barrier.

Select Verification Type
Case Note
Unable to Verify

I need help to enter or complete an educational program or to secure or hold employment.\*

# Concludes In-School Youth (ISY)

- This concludes the portion of the presentation on ISY, key points to remember are for an ISY the Youth is required to meet WIOA Low Income criteria and have one or more of the identified Youth barriers.

# Out-of-School Youth Eligibility

- WIOA E-Policy Chapter 5.4.1 - Out-of-School Youth
  - Out-of-School Youth - Youth not younger than 16 or older than age 24.

# Out-of-School Youth

- WIOA E-Policy Chapter 5.4.1 - Out-of-School Youth
  - Not attending any school as defined under state law.
  - Individuals attending Adult Education provided under Title II of WIOA, YouthBuild or Job Corps are also classified as out-of-school youth for eligibility determination;

# Guidance from TEGL 21-16

- If a youth graduates high school and registers for postsecondary education, but does not ultimately follow through with attending postsecondary education, then such a youth would be considered an OSY if the eligibility determination is made after the point that the youth decided not to attend postsecondary education.
- If the youth is only enrolled in non-credit-bearing postsecondary classes, they would not be considered attending postsecondary school and, therefore, an OSY.

# Determining School Status

- Within the Apprenticeship Expansion Application on Goals & Current Situation screen, under “Education” is where internal logic will determine if an individual is an In-School Youth (ISY) or an Out-of-School Youth (OSY).

## EDUCATION

- I am currently in school.
- I have a hard time with reading, writing, and/or math.
- I have trouble with reading or speaking English.
- I dropped out of high school.
- I have not attended high school in the last quarter.

# School Status at Application

- The school status should be recorded based on what the client is doing at the time of application, not what the client is going to enter.
- If the client is not attending any high school or post-secondary school (College, Technical or Vocational) the question of “I am currently in school.” should be left unchecked.
- When the question of “I am currently in school.” is left unchecked, if the client is between the ages of 16 and 24, internal logic will consider the individual an Out-of-School Youth for eligibility consideration.

## **The following out-of-school youth barriers do not require the individual to meet low income criteria:**

1. School Dropout
2. Within the age of compulsory attendance but has not attended school for at least the most recent complete school year quarter
3. Subject to the juvenile or adult justice system
4. Homeless
5. Runaway
6. Foster care or aged out of foster care
7. Pregnant or parenting
8. An individual with a disability

# High School Drop Out

- Within the Apprenticeship Expansion Application on Goals & Current Situation screen, under “Education” is where there is a question “I dropped out of high school.”
- This barrier can only be used for an individual who drops out of High School and has not gone back to school. If they dropped out but went back or obtained their General Equivalency Degree (GED), they are not considered a “Drop Out” under WIOA Eligibility.

## EDUCATION

- I am currently in school.
- I have a hard time with reading, writing, and/or math.
- I have trouble with reading or speaking English.
- I dropped out of high school.

# Documentation for Drop Out

- If a client under the age of 25 indicated “I dropped out of high school.” in the application, it is a barrier to support Youth eligibility.
- Below are the choices for the documentation to support the barrier of a disability.
- If the client met the General WIOA Eligibility and has this barrier they would be eligible as an Out of School Youth.

Select Verification Type	
Attendance Records	
<b>Dropout Letter</b>	<input checked="" type="checkbox"/> I dropped out of high school.*
WIOA Application (signed and dated)-not attending School	
Unable to Verify	

## Not Attended High School in a Quarter

- In some instances, a High Schools might not consider an individual to be a High School Drop Out until the end of a school year.
- Under the WIOA legislation, the Out-of-School Youth barrier of “Within the age of compulsory attendance but has not attended school for at least the most recent complete school year quarter” was added for this reason.

# Not Attended High School in a Quarter

- Within the Apprenticeship Expansion Application on Goals & Current Situation screen, under “Education” is where there is a question “I have not attended high school in the last quarter.”
- This barrier can only be used for an individual who is of legal age to drop out, and has not attended school in the last quarter, but the school does not consider the individual as a drop out.

## EDUCATION

- I am currently in school.
- I have a hard time with reading, writing, and/or math.
- I have trouble with reading or speaking English.
- I dropped out of high school.
- I have not attended high school in the last quarter.

# Documentation for Not Attending School

- If a client is of legal age to drop out of High School, but the school does not consider the individual a drop out, the barrier of “Within the age of compulsory attendance but has not attended school for at least the most recent complete school year quarter” was added.
- If the question of “I have not attended high school in the last quarter.” is checked, below are the documentation choices.
- If the client met the General WIOA Eligibility and has this barrier marked they would be eligible as an Out of School Youth.

Select Verification Type
Attendance Records
Written verification from Educational Institution
Unable to Verify

I have not attended high school in the last quarter.\*

# Subject to Justice System

- Under the WIOA legislation, under In-School Youth (ISY) there is a barrier for an "Offender", for the Out-of-School Youth (OSY) this barrier is called, "Subject to the juvenile or adult justice system."
- In the March 2017, TEGL 21-16 - WIOA Youth guidance it was clarified that the OSY barrier of "Subject to the juvenile or adult justice system" has the same definition as the ISY barrier of "Offender".

# Subject to Justice System

- An adult or youth is “Subject to the Juvenile or Adult Justice System” if, (A) who is or has been subject to any stage of the criminal justice process, for whom services under this Act may be beneficial; or (B) who requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

# Subject to Justice System

- As previously mentioned, many of the questions related to Youth barriers are on the Goals & Current Situation screen in the Apprenticeship application.
- Under “Legal”, as shown below are two questions, if either question is checked, it would be indicated as the barrier of “Subject to the Juvenile or Adult Justice System” for an Out-of-School Youth client.

## LEGAL

- I have criminal charges pending.
- I have had instances/legal problems.

# Documentation for Subject to Justice System

- For the questions related to “Legal” that are tied to the Out-of-School Youth barrier of “Subject to the Juvenile or Adult Justice System” below are the current acceptable documentation choices available.

Select Verification Type
Applicant statement/self attestation, in limited cases
Court Documents
Halfway house resident
<b>Letter from probation officer</b>
Letter of parole
Police records
Unable to Verify

I have/had instances or legal problems.\*

# Out-of-School Youth Barriers

- For the other Out-of-School Youth barriers that **do not** require a client to meet **WIOA low income criteria** are shown in the adjacent column, we have already covered the place in the application where those questions are addressed and the various documentation for those barriers.
  - Homeless
  - Runaway
  - Foster care or aged out of foster care
  - Pregnant or parenting
  - An individual with a disability

# Out-of-School Youth Barriers

- If an Out-of-School Youth (OSY) did not meet any of the previously addressed barriers, there are two more possible barriers that could support OSY eligibility, but both require the client to meet WIOA Low Income criteria with the barrier.

## The following out-of-school youth barriers require the individual to meet WIOA low income criteria:

1. A recipient of a secondary school diploma or its recognized equivalent who is low-income individual and is
  - Basic Skills Deficient, or
  - An English language learner
2. A low-income individual requiring additional assistance to enter or complete an educational program or to secure or hold employment (must be justified based on local policy.)

# H.S. Diploma or GED & BSD or ELL

- For this barrier, the client will need to have been an OSY that has already graduated H.S. or completed their GED, but is Basic Skills Deficient from any of the various ways that were addressed on slides 13-20 in this power point.

# Youth Requiring Assistance

- For the barrier of “requiring additional assistance to enter or complete an educational program or to secure or hold employment.” were addressed on slides 38-40 of this power point.

# WIOA Youth Eligibility

- This concludes the block on Youth Eligibility.
- If you have any questions please contact James (Jim) Potts at [james.potts@Illinois.gov](mailto:james.potts@Illinois.gov) or call him at (217) 416-7097.

The Illinois workNet Center System, an American Job Center, is an equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers may be reached by persons using TTY/TDD equipment by calling TTY (800) 526-0844 or 711. This workforce product was funded by a grant awarded by the U.S. Department of Labor's Employment and Training Administration. For more information, please refer to the footer at the bottom of any webpage at [illinoisworknet.com](http://illinoisworknet.com).